

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA,

v.

11-CR-300 (JSR)

RICHARD LIPSKY,

Defendant.

-----X

**NOTICE OF MOTION OF DEFENDANT RICHARD LIPSKY
FOR AN EXEMPTION FROM 29 U.S.C. §504(a)(1)**

PLEASE TAKE NOTICE that, pursuant to 29 U.S.C. §504(a)(5) and upon the annexed Declaration of Defendant Richard Lipsky, subscribed to on July 25, 2016, and the exhibits thereto; the accompanying Memorandum of Law; and all pleadings and proceedings hitherto had herein, Richard Lipsky, by and through his undersigned counsel, will move this Court, The Honorable Jed S. Rakoff, United States District Judge, presiding, at a date and time to be set by the Court, at the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, N.Y., in Courtroom 14B thereof, should the Court determine to hear argument, for an Order granting him an Exemption from the prohibition contained in 29 U.S.C. §504(a)(1) so that he may be employed by a labor union as a consultant in advising with respect to certain criminal

justice issues.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's instructions, any papers in opposition should be filed by September 14, 2016.

September 8, 2016

Yours, etc.

GERALD B. LEFCOURT, P.C.

By: _____/s/_____

Gerald B. Lefcourt

Faith A. Friedman

Sheryl E. Reich

148 East 78th Street

New York, N.Y. 10075

(212) 7370400

(212) 988-6192

Lefcourt@lefcourtlaw.com

Attorneys for Richard Lipsky